

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

**JACQUELINE WASHINGTON**

**CASE NO. 5:23-CV-01623-SMH-MLH**

**VERSUS**

**JUDGE S. MAURICE HICKS, JR.**

**BROOKSHIRE GROCERY CO.**

**MAGISTRATE JUDGE HORNSBY**

**MOTION FOR LEAVE TO FILE  
AMENDED PETITION [COMPLAINT] FOR DAMAGES**

**NOW INTO COURT**, through undersigned counsel, comes plaintiff, **JACQUELINE WASHINGTON**, who with respect desires to amend her original Petition for Damages for the following reasons:

1.

The non-jury trial in this matter is set for March 24, 2025.

2.

The deadline for the joinder of parties and amendment of pleadings is March 12, 2024.

3.

The plaintiff filed this lawsuit seeking, among other things, damages in connection with injuries as a result of a slip and fall at Brookshire Grocery Company [Brookshire's] in Mansfield, DeSoto Parish, Louisiana.

4.

In her original Petition for Damages, the plaintiff names Brookshire's as a defendant. Subsequent to the filing of the plaintiff's original Petition for Damages, defendant Brookshire's liability insurer has been identified as The Travelers Indemnity Company of Connecticut.

5.

The plaintiff now seeks leave in this action to amend her original Petition for Damages to name The Travelers Indemnity Company of Connecticut as a defendant, as set forth in the Amended Petition [Complaint] for Damages which is attached to this motion.

6.

Furthermore, the plaintiff seeks leave in this action to amend her original Petition for Damages to include additional information regarding the plaintiff's injuries and damages as a result of the accident herein, as set forth in the Amended Petition [Complaint] for Damages which is attached to this motion.

7.

#### **CERTIFICATE OF CONFERENCE WITH COUNSEL**

Counsel for the plaintiff has contacted Mr. James A. Mijalis, counsel for defendant Brookshire's, with regard to the filing of this Motion for Leave to File Amended Petition [Complaint] for Damages. Counsel for defendant Brookshire's expressed that he had **no objection** to the filing of this motion for leave.

**WHEREFORE**, plaintiff, Jacqueline Washington, prays for leave to amend her Petition for Damages as set forth in the Amended Petition [Complaint] for Damages which is attached hereto.

**LAW OFFICES OF WHITE & WHITE**

**BY:** *S/ Adrienne D. White*

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**ATTORNEYS FOR** Jacqueline Washington

**CERTIFICATE**

I hereby certify that on March 11, 2024, a copy of the foregoing *Motion for Leave to File Amended Petition [Complaint] for Damages* was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Mr. James A. Mijalis, counsel for the defendant, Brookshire Grocery Company, by operation of the court's electronic filing system.

A courtesy copy of this filing will be mailed to the Honorable Mark L. Hornsby, United States Magistrate Judge.

*S/ Adrienne D. White*

**ADRIENNE D. WHITE**